

**EXHIBIT A**

10-23-'12 11:02 FROM-

T-079 P0010/0014 F-365

**NASH & TOBIAS, LLC**  
1107 Convery Boulevard  
Perth Amboy, NJ 08861  
(732)324-7777  
Attorney for Plaintiff

RECEIVED-FILED  
OCT -7 AM '12

**MOURAD ROSHDI**

Plaintiff,

vs.

**STEPHEN A. WABUNOHA,  
ROADRUNNER TRANSPORTATION  
SERVICES, INC. and JOHN DOES 1-10:  
(said names being fictitious)**

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION:MIDDLESEX COUNTY

DOCKET NO. MID-L-5391-11

**CIVIL ACTION**

**FIRST AMENDED  
COMPLAINT AND JURY DEMAND**

Plaintiff, **MOURAD ROSHDI**, residing at 125 Winding Wood Dr., Apt. 6A, in the Municipality of Sayreville, County of Middlesex, State of New Jersey, complaining of the defendants herein says:

**FIRST COUNT**

1.. On or about June 26, 2010, the plaintiff, **MOURAD ROSHDI**, was the owner and operator of a motor vehicle which was lawfully and properly proceeding West through the parking lot of 206 Deans Lane, in the Municipality of South Brunswick, County of Middlesex and State of New Jersey.

2. At the time and place aforesaid, the defendants, **STEPHEN A. WABUNOHA** and **ROADRUNNER TRANSPORTATION SERVICES, INC.**, were the owners of a motor vehicle proceeding North through the parking lot of 206 Deans Lane, in the Municipality of South Brunswick, County of Middlesex and State of New Jersey.

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3. At the time and place aforesaid, the defendant, STEPHEN A. WABUNOHA, operated his vehicle so negligently and carelessly in the parking lot of 208 Deans Lane, that he was caused to strike and collide with the plaintiff's vehicle, striking the left side fender/hood area, causing damage to plaintiff's vehicle and causing the plaintiff, MOURAD ROSHDI, to sustain serious personal injuries.

4. As a direct and proximate result of the joint and several aforesaid acts of negligence of the defendants, STEPHEN A. WABUNOHA and ROUND RUNNER TRANSPORTATION SERVICES, INC., the plaintiff, MOURAD ROSHDI, suffered serious temporary and permanent injuries and suffered past, present and will suffer future pain and suffering and will require medical care and will expend diverse sums of money for his treatment and cure, and has in the past and will in the future, be prevented from attending to his normal activities.

WHEREFORE, plaintiff, MOURAD ROSHDI, demands judgment against the defendants, STEPHEN A. WABUNOHA and ROADRUNNER TRANSPORTATION SERVICES, INC., jointly and severally, for damages plus interest and costs of suit.

#### SECOND COUNT

1. Plaintiff repeats the allegations contained in the previous counts of this Complaint and makes them a part hereof.

2. The defendants, John Does I-10, are fictitious names intended to identify any and all parties including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants were responsible for the ownership, operation, control, lease, and maintenance of the vehicles

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involved in the collision referred to herein or who in any way caused or contributed to plaintiff's injuries.

3. As a direct and proximate result of the negligence of the defendants aforesaid, plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

WHEREFORE, plaintiff, MOURAD ROSHDI, demands judgment against the defendants, John Does 1-10, for damages plus cost of suit on this Count.

**JURY DEMAND**

The plaintiff demands a trial by a jury as to all of the issues in the within matter.

**DEMAND FOR INSURANCE INFORMATION**

Pursuant to R4:10-2(b), plaintiff hereby demands production within 30 days of a copy of the contents of any insurance agreement under which the defendants may be covered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**DESIGNATION OF TRIAL COUNSEL**

FRANK A. TOBIAS, ESQ. is hereby designated trial counsel as to all issues so triable.

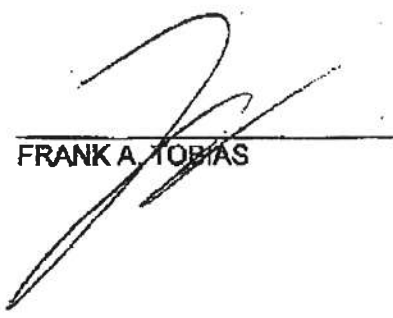
10-23-'12 11:02 FROM-

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CERTIFICATION

Frank A. Tobias, of full age, hereby certifies as follows:

1. That the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated.
2. I know of no other party or person who should be joined in this action.
3. This Certification is made pursuant to Rule 4:5-1.
4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
FRANK A. TOBIAS

Dated: October 6, 2011

**EXHIBIT B**

10-23-'12 11:01 FROM-

T-079 P0006/0014 F-365

**NASH & TOBIAS, LLC**  
1107 Convery Boulevard  
Perth Amboy, NJ 08861  
(732)324-7777  
Attorney for Plaintiff

CIVIL RECORDS  
N.J. SUPERIOR COURT  
MIDDLESEX VICINAGE

2011 JUL 26 A 9 9

FILED & RECEIVED

**MOURAD ROSHDI**

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION:MIDDLESEX COUNTY

Plaintiff,

vs.

: DOCKET NO. 65391-11

**STEPHEN A. WABUNOHA**  
and **JOHN DOES 1-10**,  
said names being fictitious,

: CIVIL ACTION  
: COMPLAINT AND JURY DEMAND

Defendants.

Plaintiff, **MOURAD ROSHDI**, residing at 125 Winding Wood Dr., Apt. 6A,  
in the Municipality of Sayreville, County of Middlesex, State of New Jersey,  
complaining of the defendants herein says:

**FIRST COUNT**

1. On or about June 26, 2010, the plaintiff, **MOURAD ROSHDI**, was the operator of a motor vehicle which was lawfully and properly proceeding West through the parking lot of 206 Deans Lane, in the Municipality of South Brunswick, County of Middlesex and State of New Jersey.

2. At the time and place aforesaid, the defendant, **STEPHEN A. WABUNOHA**, was the owner of a motor vehicle proceeding North through the parking lot of 206 Deans Lane, in the Municipality of South Brunswick, County of Middlesex and State of New Jersey.

3. At the time and place aforesaid, the defendant, **STEPHEN A.**

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WABUNOHA, operated his vehicle so negligently and carelessly in the parking lot of 206 Deane Lane, that he was caused to strike and collide with the plaintiff's vehicle, striking the left side fender/hood area, causing damage to plaintiff's vehicle and causing the plaintiff, MOURAD ROSHDI to sustain serious personal injuries.

4. As a direct and proximate result of the aforesaid negligence of the defendants, STEPHEN A. WABUNOHA, the plaintiff, MOURAD ROSHDI, suffered serious temporary and permanent injuries and suffered past, present and will suffer future pain and suffering and will require medical care and will expend diverse sums of money for his treatment and cure, and has in the past and will in the future, be prevented from attending to his normal activities.

WHEREFORE, plaintiff, MOURAD ROSHDI, demands judgment against the defendants, STEPHEN A. WABUNOHA, for damages plus costs of suit on this Count.

#### SECOND COUNT

1. Plaintiff repeats the allegations contained in the previous counts of this Complaint and makes them a part hereof.

2. The defendants, John Does 1-10, are fictitious names intended to identify any and all parties including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants were responsible for the ownership, operation, control, lease, and maintenance of the vehicles involved in the collision referred to herein or who in any way caused or contributed to plaintiff's injuries.



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3. As a direct and proximate result of the negligence of the defendants aforesaid, plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

WHEREFORE, plaintiff, MOURAD ROSHDI, demands judgment against the defendants, John Does 1-10, for damages plus cost of suit on this Court.

JURY DEMAND

The plaintiff demands a trial by a jury as to all of the issues in the within matter.

DEMAND FOR INSURANCE INFORMATION

Pursuant to R4:10-2(b), plaintiff hereby demands production within 30 days of a copy of the contents of any insurance agreement under which the defendants may be covered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

CERTIFICATION

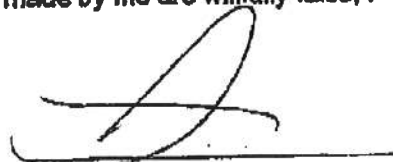
Frank A. Tobias, of full age, hereby certifies as follows:

1. That the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated.
2. I know of no other party or person who should be joined in this action.
3. This Certification is made pursuant to Rule 4:5-1.
4. I certify that the foregoing statements made by me are true. I am

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aware that if any of the foregoing statements made by me are willfully false, I  
am subject to punishment.



FRANK A. TOBIAS  
Dated: July 21, 2011

**EXHIBIT C**

10-23-'12 11:01 FROM-  
 Attorney(s): Nash & Tobias, LLC  
 Address: 1107 Convery Boulevard  
 Perth Amboy, NJ 08861  
 Telephone No.: 732-324-7777  
 Attorney(s) for Plaintiff(s): Mourad Roshdi

T-073 P0003/0014 F-365

MOURAD ROSHDI  Plaintiff,  vs.  STEPHEN A. WABUNOHA, ROADRUNNER TRANSPORTATION SERVICES, INC. and JOHN DOES 1-10: (said names being fictitious)  Defendants.	: SUPERIOR COURT OF NEW JERSEY : LAW DIVISION-MIDDLESEX COUNTY : : DOCKET NO. MID-L-5391-11 : : : <u>CIVIL ACTION</u> : : <u>Summons</u>
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From the State of New Jersey  
 To the Defendant(s) named above: ROADRUNNER TRANSPORTATION SERVICES, INC.

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A filing fee\* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff's demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: October 23, 2012

/s/ Jennifer M. Perez  
 JENNIFER M. PEREZ  
 Superior Court Clerk

Name of Defendant to above Served: Roadrunner Transportation Services  
 Address of the Defendant to be Served: 5901 Long Creek Park Drive, Suite H, Charlotte, NC 28269

\$135.00 FOR CHANCERY DIVISION CASES OR \$135.00 FOR LAW DIVISION CASES

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X  
MOURAD ROSHDI,

Plaintiff,

CIVIL ACTION NO.:

v.

STEPHEN A. WABUNOHA, ROADRUNNER  
TRANSPORTATION SERVICES, INC. and JOHN  
DOES 1-10 (said names being fictitious),

**CERTIFICATION OF SERVICE**

Defendant(s).

-----X

LORNE M. REITER, ESQ. certifies as follows:

1. I am an attorney duly admitted to practice before this Honorable Court, and I hereby affirm the truth of the following statements under the penalty of perjury.

2. I am a member with the law firm of LAW OFFICES OF LORNE M. REITER, LLC, attorneys for the defendants STEPHEN A. WABUNOHA and ROADRUNNER TRANSPORTATION SERVICES, INC. and as such I am fully familiar with the facts set forth.

3. On this date, I served copies of the within Notice of Removal upon the plaintiff in this action by mailing same via First Class Mail from 740 River Road, Fair Haven, New Jersey 07704 addressed to the plaintiff's attorney, Frank A. Tobias, Esq., Nash and Tobias, LLC, 1107 Convery Boulevard, Rt. 35 South, Perth Amboy, New Jersey 08861.

4. Further, on this date, I caused a copy of the Notice of Removal to be filed with the Clerk of the Superior Court of New Jersey, Law Division, Middlesex County Courthouse, 1 JFK Square, P.O. Box 964, New Brunswick, New Jersey 08903-0964.

5. Pursuant to 28 U.S.C. §1746, I affirm under penalty of perjury that the foregoing is true and correct.

Dated: November 16, 2012

LAW OFFICES OF LORNE M. REITER, LLC  
Attorneys for defendants STEPHEN A. WABUNOHA and  
ROADRUNNER TRANSPORTATION SERVICES, INC.

BY:



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LORNE M. REITER, ESQ.